



June 17, 2022

**BY ECF**

Hon. Paul A. Engelmayer  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *D.J.C.V., et al. v. United States of America*, No. 20-cv-5747 (PAE)

Dear Judge Engelmayer:

We represent the Plaintiffs in the above-captioned matter. On June 10, 2022, the Parties met and conferred regarding the proposed merits discovery plan and status update scheduled to be filed with the Court on June 17 and June 24, 2022. *See* Dkt. Nos. 124 and 127. We write on behalf of both Parties to respectfully request a one-month extension of the Court's June 17, 2022, deadline to provide a proposed merits discovery plan and status update.

On March 21, 2022, the Court approved the Parties' proposed jurisdictional discovery plan. *See* Dkt. No. 116. On May 25, 2022, Defendant requested and received a two-week extension to provide additional document productions to the Plaintiffs. *See* Dkt. No. 124. In accordance with the Court's May 25 Order, Defendant completed its document productions for jurisdictional discovery on June 8, 2022. The productions are voluminous, totaling over 65,000 documents and over 285,000 pages of material.

Plaintiffs are reviewing the jurisdictional discovery to identify relevant materials and individuals with information related to G.C. and D.J.C.V.'s initial period of separation. This review will inform Plaintiffs' jurisdictional discovery depositions. The Parties want to ensure that any proposed merits discovery is not duplicative of jurisdictional discovery. To do that, the Parties agree that Plaintiffs need additional time to review the jurisdictional discovery because it will help determine the scope of the proposed merits discovery plan, if necessary and as appropriate given the discovery agreement currently in place between the Parties.<sup>1</sup>

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<sup>1</sup> Plaintiffs also note that they have had recent turnover on their case teams which has required additional time for new members to review relevant materials and become familiar with the case.



Accordingly, the Parties respectfully request that their deadline to file a combined proposed merits discovery plan and status update be extended to July 15, 2022. We thank the Court for its attention to this matter.

Sincerely,

/s/

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/s/


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Granted. The Court thanks the parties for assiduously pursuing discovery in this matter. No further extensions to the July 15, 2022 deadline for a status update and proposed merits discovery plan should be expected. SO ORDERED.

  
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PAUL A. ENGELMAYER  
United States District Judge  
6/21/22